



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
2018 NOV 27 AM 9:19

SENSITIVE

November 26, 2018

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP by MAH*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: *KDR* Kristin D. Roser/Ben Holly *BH*
Reports Analysis Division
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2018 October Quarterly Report
(Election Sensitive) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2018 October Quarterly Report (Election Sensitive) in accordance with 52 U.S.C. § 30104(a). The October Quarterly Report was due on October 15, 2018.

Under the Administrative Fine Program, the October Quarterly Report is considered an election-sensitive filing for authorized committees supporting candidates involved in the general election as well as all unauthorized committees. For the committees listed on the attached RTB Circulation Report, the October Quarterly Report was an election-sensitive filing. The committees either filed the report after the due date, failed to file the report or failed to file the report prior to four (4) days before the general election (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 CFR. 111.43, these committees should be assessed the civil money penalties included on the attached report.

SECRET

- ‘

11/26/2018 3:31 PM

Federal Election Commission
Reason to Believe Circulation Report
2018 OCTOBER QUARTERLY Election Sensitive 10/15/2018 H_S_P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
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3496	C00879068	DEMOCRACY FIRST		PAMELA PARIZEK	\$137,500	0		Not Filed	\$137,500 (est)	\$7,088
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3501	C00131706	PIPEFITTERS LOCAL UNION #524		PATRICK DOLAN	\$194,859	0		Not Filed	\$32,477 (est)	\$1,866
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2018)
October Quarterly Report (Election)
Sensitive) for the Administrative Fine)
Program:)

DEMOCRACY FIRST, and PAMELA) AF# 3496
PARIZEK as treasurer;)

PIPEFITTERS LOCAL UNION #524, and) AF# 3501
DOLAN, PATRICK as treasurer;)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 12, 2018 the Commission took the following actions on the Reason To Believe Recommendation - 2018 October Quarterly Report (Election Sensitive) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated November 26, 2018, on the following committees:

AF#3496 Decided by a vote of 4-0 to: (1) find reason to believe that DEMOCRACY FIRST, and PAMELA PARIZEK in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3501 Decided by a vote of 4-0 to: (1) find reason to believe that PIPEFITTERS LOCAL UNION #524, and DOLAN, PATRICK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
December 12, 2018

Page 5

Attest:

December 13, 2018
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 13, 2018

Patrick Dolan, in official capacity as Treasurer
Pipefitters Local Union #524
711 Corey Street
Scranton, PA 18505

C00131706
AF#: 3501

Dear Mr. Dolan:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an October Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period July 1, 2018 through September 30, 2018, shall be filed no later than October 15, 2018. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report prior to four (4) days before the general election held on November 6, 2018, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On December 12, 2018, the FEC found that there is reason to believe ("RTB") that Pipefitters Local Union #524 and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before October 15, 2018. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$1,866. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$1,866 is due within forty (40) days of the finding, or by January 21, 2019, and is based on these factors:

Sensitivity of Report: Election Sensitive
Level of Activity: \$32,477
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 1050 First Street, NE, Washington, DC 20002. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or January 21, 2019. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Pipefitters Local Union #524 and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Aimee Wechsler in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Carole C. Hunter

Caroline C. Hunter
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$1,866 for the 2018 October Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Pipefitters Local Union #524

FEC ID#: C00131706

AF#: 3501

PAYMENT DUE DATE: January 21, 2019

PAYMENT AMOUNT DUE: \$1,866



UNITED ASSOCIATION

of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

Founded 1889

Letters should
be confined to
one subject

UA Local Union:

Subject:

RECEIVED
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Attachment 1
2 Pages

Mark McManus
General President

Patrick H. Kellett
General Secretary-Treasurer

Michael A. Pleasant
Assistant General President

January 4, 2019

Federal Election Commission
Office of Administrative Review
1050 First Street, NE
Washington, D.C., 20002

RE: Patrick Dolan, in official capacity as Treasurer
Pipefitters Local Union #524
AF#: 3501

To whom it may concern,

I am writing to contest the civil penalty in the amount of \$1,866 imposed by the Federal Election Commission on December 13, 2018 for failing to file timely the quarterly report for October 15, 2018.

The Pipefitters Local Union #524 Political Committee Fund only makes contributions to state and local candidates not federal candidates. Therefore, Pipefitters Local Union #524 Political Committee Fund should not be filing reports with the Federal Election Commission.

The Pipefitters Local Union #524 Political Committee Fund should not have been registered to file reports.

I called the Federal Election Commission on January 4, 2019 to get information about the process to end the requirement for, Pipefitters Local Union #524 Political Committee Fund, to file Federal Election Commission Reports. However, due to the current government shut down, the office was closed.

I have attached a copy of the general ledger for the period 1/1/2018 to 12/31/2018 which shows all the contributions that were made by the Pipefitter Local Union #524 Political Committee Fund during this period. There are no contributions to federal candidates.

I declare under penalty and perjury that the foregoing is true and correct.

Sincerely,

Patrick Dolan
Treasurer



1:07 PM
01/07/19
Cash Basis

PIPEFITTERS LOCAL 524 POLITICAL ACTION
Transaction Detail By Account
January through December 2018

Type	Date	Num	Name	Split	Paid Amount	Balance
POLITICAL CONTRIBUTIONS						
Check	01/19/2018	2079	CITIZENS FOR GERALD MULLERY	CASH CHECKI...	1,000.00	1,000.00
Check	01/29/2018	2080	Friends of Tarah Probst	CASH CHECKI...	2,000.00	3,000.00
Check	01/29/2018	2081	PA AFL-CIO-COPE	CASH CHECKI...	1,000.00	4,000.00
Check	02/14/2018	2082	CITIZENS FOR JOHN YUDICHAK	CASH CHECKI...	500.00	4,500.00
Check	03/06/2018	2083	McNally's Retirement	CASH CHECKI...	0.00	4,500.00
Check	03/06/2018	2084	Friends of Frank Dermody	CASH CHECKI...	1,000.00	5,500.00
Check	03/06/2018	2085	FRIENDS OF SID MICHAELS KAVULICH	CASH CHECKI...	1,000.00	6,500.00
Check	03/09/2018	2086	FRIENDS OF MAUREEN MADDEN	CASH CHECKI...	1,000.00	7,500.00
Check	03/19/2018	2087	Friends of Kyle Mullins	CASH CHECKI...	2,000.00	9,500.00
Check	03/20/2018	2088	FRIENDS OF JOHN BLAKE	CASH CHECKI...	500.00	10,000.00
Check	04/06/2018	2089	Committee to Elect Eddie Day Pashinski	CASH CHECKI...	460.00	10,460.00
Check	04/11/2018	2090	Friends of Evie Rafalko-McNulty	CASH CHECKI...	300.00	10,760.00
Check	04/19/2018	2091	FRIENDS OF MARTY FLYNN	CASH CHECKI...	500.00	11,260.00
Check	06/01/2018	2093	Friends of Senator John Blake	CASH CHECKI...	250.00	11,510.00
Check	06/01/2018	2094	FRIENDS OF MIKE CARROLL CTM.	CASH CHECKI...	3,500.00	15,010.00
Check	06/15/2018	2095	TOM WOLF FOR GOVERNOR	CASH CHECKI...	30,000.00	45,010.00
Check	06/22/2018	2097	FRIENDS OF MAUREEN MADDEN,	CASH CHECKI...	1,000.00	46,010.00
Check	07/16/2018	2099	POTTSVILLE CITY -D-CTM	CASH CHECKI...	50.00	46,060.00
Check	07/25/2018	2100	Friends of Tarah Probst	CASH CHECKI...	1,500.00	47,560.00
Check	07/25/2018	2101	Friends of Senator John Blake	CASH CHECKI...	1,100.00	48,660.00
Check	07/27/2018	2102	Committee to Elect Pat M. O'Malley	CASH CHECKI...	350.00	49,010.00
Check	08/02/2018	2104	Pine Grove Democratic Committee	CASH CHECKI...	100.00	49,110.00
Check	08/08/2018	2105	Friends of Mike O'Pake for District Att'y	CASH CHECKI...	300.00	49,410.00
Check	08/08/2018	2106	TOM WOLF FOR GOVERNOR	CASH CHECKI...	10,000.00	59,410.00
Check	08/15/2018	2107	Friends of Kyle Mullins	CASH CHECKI...	1,000.00	60,410.00
Check	08/15/2018	2108	Committee to Elect Eddie Day Pashinski	CASH CHECKI...	1,000.00	61,410.00
Check	08/15/2018	2109	FRIENDS OF SID MICHAELS KAVULICH	CASH CHECKI...	500.00	61,910.00
Check	08/23/2018	2110	Committee to Elect Pat M. O'Malley	CASH CHECKI...	1,500.00	63,410.00
Check	08/24/2018	2111	Friends of Bill Troutman	CASH CHECKI...	500.00	63,910.00
Check	08/24/2018	2112	Friends of Frank Dermody	CASH CHECKI...	1,000.00	64,910.00
Check	08/28/2018	2113	LUZERNE CTY DEMOCRATIC CMT	CASH CHECKI...	220.00	65,130.00
Check	08/28/2018	2114	FRIENDS OF MARTY FLYNN	CASH CHECKI...	900.00	66,030.00
Check	09/13/2018	2115	Lackawanna County Democratic Committee	CASH CHECKI...	700.00	66,730.00
Check	09/13/2018	2116	Friends of Jonathan Fritz	CASH CHECKI...	1,000.00	67,730.00
Check	09/13/2018	2117	Baker for Senate Committee	CASH CHECKI...	1,000.00	68,730.00
Check	09/13/2018	2118	Friends of Karen Boback	CASH CHECKI...	1,000.00	69,730.00
Check	09/13/2018	2119	Rosemary Brown for State Representative	CASH CHECKI...	1,000.00	70,730.00
Check	09/20/2018	2121	Political Labor Action Now (PLAN)	CASH CHECKI...	1,000.00	71,730.00
Check	09/20/2018	2122	South Schuylkill Democratic Club	CASH CHECKI...	72.00	71,802.00
Check	10/04/2018	2123	Neilson For The Northeast	CASH CHECKI...	500.00	72,302.00
Check	10/11/2018	2124	Friends of Evie Rafalko-McNulty	CASH CHECKI...	400.00	72,702.00
Check	10/16/2018	2125	PAC 112	CASH CHECKI...	1,250.00	73,952.00
Total POLITICAL CONTRIBUTIONS					73,952.00	73,952.00
TOTAL					73,952.00	73,952.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 2019

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 3501 – Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer (C00131706)

Summary of Recommendation

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalty.

Reason-to-Believe Background

The 2018 October Quarterly Report was due on October 15, 2018. The respondents have not yet filed the report. The report is election sensitive and was not filed prior to four days before the general election; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2).

On December 12, 2018, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 October Quarterly Report and made a preliminary determination that the civil money penalty was \$1,866 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on December 13, 2018 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a committee not authorized by a candidate shall file a report for the quarter ending September 30 no later than October 15. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(1)(i). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Summary of Respondents' Challenge

On January 28, 2019, the Commission received the written response ("challenge") from the Treasurer. The challenge states:

The Pipefitters Local Union #524 Political Committee Fund only makes contributions to state and local candidates not federal candidates. Therefore, Pipefitters Local Union #524 Political Committee Fund should not be filing reports with the Federal Election Commission. The Pipefitters Local Union #524 Political Committee Fund should not have been registered to file reports.

The Treasurer also states that he attempted to call Commission staff regarding the termination process on January 4, 2019. However, the Commission was closed due to the government shutdown.

Analysis

The respondents were notified of their requirement to file the 2018 October Quarterly Report on multiple occasions. On September 27, 2018, the Commission's Information Division sent the 2018 October Quarterly Report Prior Notice to jrobertson@saltercpa.com, the email address listed on the Committee's Statement of Organization. The notice specifically highlighted the Committee's requirement to file the 2018 October Quarterly Report by October 15, 2018. On October 16, 2018, the day following the filing deadline, the Commission's Electronic Filing Office sent a late notification email to the same email address, because the report had not yet been filed. On November 2, 2018, RAD sent the non-filer notification to the same email address. Despite receiving these notifications, the Committee did not attempt to reach Commission staff regarding their filing requirements until after it received the RTB notification in this matter.

The Committee contends it was not required to file the 2018 October Quarterly Report. Further, the Committee states it should not be registered to file with the Commission since it does not contribute to federal candidates.

On July 22, 1980, the Committee registered with the Commission as a political committee. It has filed reports with the Commission since that time. Mr. Patrick Dolan has been the Treasurer since July 29, 2015 and most recently timely filed the 2018 July Quarterly Report on July 10, 2018. That report disclosed \$56,360.42 in total federal receipts and \$48,822.04 in total federal disbursements for calendar year 2018 to date.

On March 27, 2019, RAD contacted the Committee to discuss its current status and intent to terminate. The Treasurer indicated that it recently transitioned to a new consulting firm, which recognized the Committee is not required to file with the Commission. The Treasurer confirmed the Committee does not make contributions in connection with federal elections and intends to terminate. RAD advised the Committee of the requirements to terminate and requested that the Committee immediately file a Form 99 (Miscellaneous Electronic Submission) to document its activity for the 2018 October Quarterly reporting period. On March 28, 2019, the Committee filed

the Form 99 (Miscellaneous Electronic Submission) stating it had no federal receipts and no federal disbursements during the period.¹

A committee's filing obligation ends only when the committee files a termination report, and the Commission notifies them in writing that their termination report has been accepted. 11 C.F.R § 102.3; *Campaign Guide for Corporations and Labor Organizations*, 169. At the time of the RTB finding, the Committee had not yet filed a termination report with the Commission. Therefore, the respondents were required to timely file the 2018 October Quarterly Report. The Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a).

Based on the Form 99 (Miscellaneous Electronic Submission) filed March 28, 2019, the Reviewing Officer recommends that the Commission assess no civil money penalty (reduced from the RTB civil money penalty of \$1,866). At the time of the RTB finding, the Commission used an estimated level of activity (\$32,477) to calculate the penalty because the 2018 October Quarterly Report had not yet been filed. 11 C.F.R § 111.43(d)(2)(i). The Form 99 (Miscellaneous Electronic Submission) states the Committee had \$0 in total receipts and \$0 in total disbursements during the reporting period. Therefore, the actual level of activity for the 2018 October Quarterly reporting period is \$0.² Using the schedule of penalties at 11 C.F.R § 111.43(a), no civil money penalty should be assessed for a level of activity of \$0.

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 3501 involving Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3501 that Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$1,866); and
3. Send the appropriate letter.

Attachments

- Attachment 1 –
- Attachment 2 –
- Attachment 3 –
- Attachment 4 – Page 169 of *Campaign Guide for Corporations and Labor Organizations*
- Attachment 5 – Declaration from RAD
- Attachment 6 – Declaration from OAR

¹ RAD will assist the Committee in filing all outstanding reports, including the 2018 October Quarterly Report and Termination Report.

² All outstanding reports shall be filed prior to the Reviewing Officer's Final Determination Recommendation to the Commission. The recommended civil money penalty in the Final Determination Recommendation will be calculated using the actual level of activity of the 2018 October Quarterly Report. 11 C.F.R § 111.43(d)(3)(ii)

CHAPTER 12

Termination and debt settlement

This chapter discusses how SSFs can settle any outstanding debts and terminate their registration with the FEC. It also addresses the obligations that corporations that are commercial vendors have to political committees under the law, and the conditions under which they may settle debts with political committees.

1. Terminating the committee

An SSF may terminate its registration and reporting obligations by filing a termination report at any time, provided that:

- The committee no longer intends to receive contributions or make expenditures; and
- The committee has no outstanding debts or obligations. 102.3(a)(1) and 116.1(a).

SSFs with outstanding debts or obligations should see section 2 of this chapter, "Debt settlement."

Terminations are not accepted when a committee is involved in an FEC enforcement action (MUR), an FEC audit or litigation with the FEC.

Termination report

When filing the SSF's termination report, the treasurer must check the "Termination Report" box on Line 4(a) of the Summary Page of Form 3X. See example 12-1. The termination report must disclose:

- All receipts and disbursements not previously reported, including an accounting of debt retirement (see section 2 of this chapter); and
- The purposes for which any remaining SSF funds will be used. 102.3(a).

Committee no longer required to report once notified

The committee's reporting obligation ends when the Commission notifies the committee that the termination report has been accepted. Until the committee receives this notification, it must continue to file reports.

Disposal of remaining funds

The Commission has concluded that a political committee not authorized by a candidate may expend its funds for any lawful purpose consistent with the Act and Commission regulations. Therefore, an SSF may use its remaining funds for any otherwise legal disbursement, including turning them over to the connected organization's treasury, refunding them to the SSF's contributors or giving them to charity. See AOs 1986-32 (Sino American Coop PAC), 1983-04 (American Federation of Musicians) and 1979-42 (South Carolina National Bank PAC).

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Pipefitters Local Union #524:
 - A) Non-Filer Letter, dated November 2, 2018, referencing the 2018 October Quarterly Report (sent via electronic mail to: jrobertson@saltercpa.com);
 - B) Reason-to-Believe Letter, dated December 13, 2018, referencing the 2018 October Quarterly Report (sent via overnight mail to the address of record).
4. I hereby certify that I have searched the Commission's public records and find that Pipefitters Local Union #524 has not yet filed the 2018 October Quarterly Report with the Commission.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 4th day of February, 2019.

Kristin Roser

Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

November 2, 2018

DOLAN, PATRICK, TREASURER
PIPEFITTERS LOCAL UNION #524
711 COREY STREET
SCRANTON, PA 18505

IDENTIFICATION NUMBER: C00131706

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2018 - 09/30/2018)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Aimee Wechsler in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1194.

PIPEFITTERS LOCAL UNION #524

Page 2 of 2

Sincerely,

Debbie Chacona

Deborah Chacona
Assistant Staff Director
Reports Analysis Division

250

11020300023681

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A committee not authorized by a candidate shall file a report for the quarter ending September 30 no later than October 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time October 15, 2018 for the 2018 October Quarterly Report to be timely filed.
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Form 99 (Miscellaneous Electronic Submission) filed by Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, and received on March 28, 2019.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 29th day of March, 2019.

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

NAME OF COMMITTEE (In Full)
PIPEFITTERS LOCAL UNION #524

FEC IDENTIFICATION NUMBER
C00131706

City	State	ZIP Code
SCRANTON	PA	18505

The Committee had zero dollars in federal receipts and zero dollars in federal disbursements during the October Quarterly Reporting which covered the dates of 7/1/2018 to 9/30/2018.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 2019

Patrick Dolan, in official capacity as Treasurer
Pipefitters Local Union #524
711 Corey Street
Scranton, PA 18505

C00131706
AF#: 3501

Dear Mr. Dolan:

On December 12, 2018, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Pipefitters Local Union #524 and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 October Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$1,866 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess a reduced civil money penalty. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 1050 First Street, NE, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

Rhiannon Magruder

Rhiannon Magruder
Reviewing Officer
Office of Administrative Review



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
APR 9 2019

2019 APR -9 PM 3: 16

April 9, 2019

MEMORANDUM

SENSITIVE

To: The Commission

Through: Alec Palmer *AP* *dy* *MAH*
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3501 – Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer (C00131706)

On December 12, 2018, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 October Quarterly Report and made a preliminary determination that the civil money penalty was \$1,866 based on the schedule of penalties at 11 C.F.R. § 111.43.

On January 28, 2019, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated March 29, 2019 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer advised the Committee to file the 2018 October Quarterly Report. Upon receipt of the report, the Reviewing Officer would recommend that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and recommend a civil money penalty based on the actual level of activity disclosed on the report.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On April 2, 2019, the Committee filed the 2018 October Quarterly Report. The report discloses \$0 in total receipts and \$0 in total disbursements. Therefore, the actual level of activity of the 2018 October Quarterly Report is \$0. Using the schedule of penalties at 11 C.F.R. § 111.43(b), no civil money penalty should be assessed for a level of activity of \$0.

[illegible]

1000000000

- 1000000000**

[illegible][illegible]

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A committee not authorized by a candidate shall file a report for the quarter ending September 30 no later than October 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time October 15, 2018 for the 2018 October Quarterly Report to be timely filed.
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Form 99 (Miscellaneous Electronic Submission) filed by Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, and received on March 28, 2019.
 - b) Cover Page, Summary Page, and Detailed Summary Pages of the 2018 October Quarterly Report filed by Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, and received on April 2, 2019.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 9th day of April, 2019.

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

MISCELLANEOUS TEXT (FEC Form 99)

PAGE 1 / 1

NAME OF COMMITTEE (In Full)
PIPEFITTERS LOCAL UNION #524

FEC IDENTIFICATION NUMBER
C00131706

Mailing Address 711 COREY STREET

City State ZIP Code
SCRANTON PA 18505

The Committee had zero dollars in federal receipts and zero dollars in federal disbursements during the October Quarterly Reporting which covered the dates of 7/1/2018 to 9/30/2018.

**FEC
FORM 3X****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

PIPEFITTERS LOCAL UNION #524

ADDRESS (number and street)

711 COREY STREET

▼
☐ Check if different than previously reported. (ACC)

SCRANTON

PA

18505

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00131706

3. IS THIS REPORT

☒

NEW (N)

OR

☐

AMENDED (A)

4. TYPE OF REPORT
-
- (Choose One)

(a) Quarterly Reports:

- ☐ April 15 Quarterly Report (Q1)
- ☐ July 15 Quarterly Report (Q2)
- ☒ October 15 Quarterly Report (Q3)
- ☐ January 31 Year-End Report (YE)
- ☐ July 31 Mid-Year Report (Non-election Year Only) (MY)
- ☐ Termination Report (TER)

(b) Monthly Report Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11) (Non-Election Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12) (Non-Election Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

MM / DD / YYYY

in the State of

(d) 30-Day POST-Election Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

MM / DD / YYYY

in the State of

5. Covering Period

MM / DD / YYYY
07 / 01 / 2018

through

MM / DD / YYYY
09 / 30 / 2018

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Dolan, Patrick, D.,

Type or Print Name of Treasurer

Signature of Treasurer

Dolan, Patrick, D.,

[Electronically Filed]

Date

MM / DD / YYYY
04 / 02 / 2019

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office
Use
Only**FEC FORM 3X**
Rev. 05/2016

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

PIPEFITTERS LOCAL UNION #524

Report Covering the Period:

From:

MM / DD / YYYY
07 / 01 / 2018

To:

MM / DD / YYYY
09 / 30 / 2018

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2018		119901.68
(b) Cash on Hand at Beginning of Reporting Period.....	127440.06	
(c) Total Receipts (from Line 19)	0.00	56380.42
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	127440.06	176262.10
7. Total Disbursements (from Line 31)	0.00	48822.04
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	127440.06	127440.06
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 05/2018)

Page 3

Write or Type Committee Name

PIPEFITTERS LOCAL UNION #524

Report Covering the Period:

From:

M M	/	D D	/	Y Y Y Y Y Y
07	/	01	/	2018

To:

M M	/	D D	/	Y Y Y Y Y Y
09	/	30	/	2018

I. Receipts
COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date
11. Contributions (other than loans) From:
(a) Individuals/Persons Other Than Political Committees
(i) Itemized (use Schedule A).....

0.00

56360.42

(ii) Unitemized

0.00

0.00

(iii) TOTAL (add
Lines 11(a)(i) and (ii).....▶

0.00

56360.42

(b) Political Party Committees

0.00

0.00

(c) Other Political Committees
(such as PACs).....

0.00

0.00

(d) Total Contributions (add Lines
11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)

0.00

56360.42

12. Transfers From Affiliated/Other
Party Committees

0.00

0.00

13. All Loans Received

0.00

0.00

14. Loan Repayments Received.....

0.00

0.00

15. Offsets To Operating Expenditures
(Refunds, Rebates, etc.)
(Carry Totals to Line 37, page 5).....

0.00

0.00

16. Refunds of Contributions Made
to Federal Candidates and Other
Political Committees.....

0.00

0.00

17. Other Federal Receipts
(Dividends, Interest, etc.).....

0.00

0.00

18. Transfers from Non-Federal and Levin Funds
(a) Non-Federal Account
(from Schedule H3).....

0.00

0.00

(b) Levin Funds (from Schedule H5)

0.00

0.00

(c) Total Transfers (add 18(a) and 18(b))..

0.00

0.00

19. Total Receipts (add Lines 11(d),
12, 13, 14, 15, 16, 17, and 18(c)).....▶

0.00

56360.42

20. Total Federal Receipts
(subtract Line 18(c) from Line 19).....▶

0.00

56360.42

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share	0.00	0.00
(b) Other Federal Operating Expenditures	0.00	48822.04
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	0.00	48822.04
22. Transfers to Affiliated/Other Party Committees	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees	0.00	0.00
24. Independent Expenditures (use Schedule E)	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F)	0.00	0.00
26. Loan Repayments Made	0.00	0.00
27. Loans Made	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations)	0.00	0.00
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	0.00	48822.04
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)	0.00	48822.04

201904029145979243

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	0.00	56360.42
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	0.00	56360.42
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	0.00	48822.04
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	48822.04

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3501
Final Determination Recommendation:)
Pipefitters Local Union #524 and Patrick)
Dolan, in his official capacity as)
Treasurer (C00131706))

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election
Commission, do hereby certify that on April 18, 2019, the Commission decided
by a vote of 4-0 to take the following actions in AF 3501:

1. Adopt the Reviewing Officer recommendation for AF# 3501
involving Pipefitters Local Union #524 and Patrick Dolan, in his
official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 3501 that Pipefitters Local Union
#524 and Patrick Dolan, in his official capacity as Treasurer, violated
52 U.S.C. § 30104(a) and assess no civil money penalty (reduced
from the RTB civil money penalty of \$1,866).
3. Send the appropriate letter.

Commissioners Hunter, Petersen, Walther, and Weintraub voted
affirmatively for the decision.

Attest:

April 18, 2019
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 24, 2019

Patrick Dolan, in official capacity as Treasurer
Pipefitters Local Union #524
711 Corey Street
Scranton, PA 18505

C00131706
AF#: 3501

Dear Mr. Dolan:

On December 12, 2018, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Pipefitters Local Union #524 and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2018 October Quarterly Report. By letter dated December 13, 2018, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$1,866 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On January 28, 2019, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer advised the Committee to file the 2018 October Quarterly Report. Upon receipt of the report, the Reviewing Officer would recommend that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and recommend a civil money penalty based on the actual level of activity disclosed on the report. The Reviewing Officer Recommendation was sent to you on March 29, 2019.

On April 18, 2019, the Commission adopted the Reviewing Officer's final determination recommendation and made a final determination that Pipefitters Local Union #524 and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the level of activity disclosed on the 2018 October Quarterly Report (\$0), assessed no civil money penalty (reduced from the RTB civil money penalty of \$1,866). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual rather than the estimated level of activity was used. A copy of the Final Determination Recommendation is attached.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

Attachment

Ellen L. Weintraub

**Ellen L. Weintraub
Chair**

[illegible]

